

MAR 29 2010

CASE NUMBER: 4:10-CV-22-HLMJAMES M. HATTEN, Clerk
By: *[Signature]* Deputy Clerk

RESPONSE TO LAWSUIT FILED BY JOSE VELZQUEZ, MARIA I. ROLDOS AND PAUL E. DYER IN WHICH I, STEVEN BOSSON, AM NAMED AS ONE OF THE DEFENDANTS.

Your Honor,

I am not a lawyer and I'm not in a financial position to afford the services of a lawyer. I have prepared this response on my own. I request your forgiveness if my response does not follow customary format as I am unfamiliar with it. I have made my best effort to respond concisely to the complaint.

I never acted as a recruiter for, or at the behest of (Defendant) Southern Group.

In October 2007 I met for the first time Bernard Mosconi and Greg Mlacker of GM Mortgage at their office in Miami, Florida. They told me about (Defendant) Southern Group, the Dobson family's land development company in Tennessee.

Mr. Mosconi and Mr. Mlacker told me they were beginning to work with Southern Group to sell lots in their Development. Mr. Mosconi and Mr. Mlacker showed me various Southern Group marketing material they had on hand in their office. They directed me to the Southern Group website which included additional information about the Dobson family and the Development. The website included a video about the Development's planned amenities and included a strong personal endorsement message from the Mayor of Chattanooga on the fine character of the Dobson Family and praises for the Development project.

Mr. Mosconi and Mr. Mlacker told me that they themselves had already purchased lots in the Development. They told me that the project was still in the early development stages and that there was a great investment opportunity since many more lots were still available for purchase.

GM Mortgage told me the Dobson family had strong relationships with several banks and had arranged a 100% financing plan for credit qualified buyers to purchase lots in the Development. The financing plan was also arranged so that Southern Group would make payments for the first three years and the purchaser would not have to make any payments for three years. They enticed me to consider purchasing a lot myself.

My wife and I visited the Development and met the Dobsons. We were impressed with what we saw and we purchased a lot. After closing on our purchase GM Mortgage paid me \$10,000 and enticed me to approach my friends and family about purchasing lots in the Development as an agent of GM Mortgage.

Shortly thereafter I approached my wife's sister (Plaintiff) Isabel and her husband (Plaintiff) Jose. They lived in Atlanta and we arranged a weekend to meet at the Development in February 2008.

Isabel and Jose met with (Defendant) Josh Dobson and were given a tour of the Development. Josh Dobson explained to Isabel and Jose the 100% financing plan and how they would not have to make any payments for three years. He answered all their questions. Isabel and Jose decided to purchase a lot. After their purchase GM Mortgage paid me \$8,200 and I paid Isabel and Jose \$4,100.

Shortly thereafter I approached my personal friend (Plaintiff) Paul Dyer. I told Paul about the Development and the 100% financing plan. I directed Paul to the Southern Group website. Paul analyzed the closing documentation from the purchase of my lot and did some research on his own on the Dobson family. Paul decided to purchase a lot without visiting the Development. After his purchase GM Mortgage paid me \$6,400 and I paid Paul \$1,600.

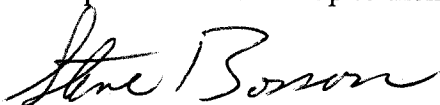
All of the documentation for these three transactions was handled by, and couriered from GM Mortgage in Miami and Southern Group in Tennessee.

During the subsequent 15 months the mortgage payments for all three of these properties were paid by Southern Group on time and without fail.

In June 2009 Southern Group was late in making payments on some of the properties in the Development. As the summer progressed Southern Group failed to pay more mortgages and it became evident that Southern Group was experiencing some sort of serious problem.

During the last four months of 2009 Josh Dobson told GM Mortgage that he was engaged with all of the lender companies who had made loans in the Development to negotiate some sort of solution. During that period of time I sent periodic email communications to the Defendants to relay whatever information I received from Southern Group or from GM Mortgage on the status of the situation.

Although neither Isabel, Jose, Paul, my ex-wife, nor I ever paid any of our money to Southern Group for the purchase of our respective lots, our credit scores have been seriously affected. Southern Group failed to pay our respective mortgage payments as they were obligated to pay from the money that they were supposed to have escrowed on each of our behalves. Along with the Defendants, and hundreds of other people who purchased properties from Southern Group, my ex-wife and I are also victims of Southern Group's failure to live up to their contractual commitments.



Steven Bosson

Tel 305-322-3230